

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PHILIP MORDI, Individually and on Behalf of
All Other Persons Similarly Situated,

Plaintiff(s),

vs.

PLANNED SECURITY SERVICES, INC. and
THE PLANNED COMPANIES, INC.

Defendants.

Civil Action No. 07 cv 7192(GBD)

**AFFIDAVIT OF DINO IULIANO IN
SUPPORT OF DEFENDANTS' MOTION
TO TRANSFER VENUE PURSUANT TO
28 U.S.C. § 1404(a)**

SUSAN C. GESSLER
Notary Public, State of New Jersey
My Commission Expires 05 / 11 / 2012

Susan Gessler
October 8, 2007

COUNTY OF MORRIS)
) ss:
STATE OF NEW JERSEY)

I, Dino Iuliano, being duly sworn, state the following:

1. I am the Vice President of Operations for Defendant Planned Security Services, Inc. ("Planned Security") and submit this affidavit in support of the motion to transfer venue.
2. Planned Security is a wholly owned subsidiary of Defendant, The Planned Companies.
3. Defendants Planned Security and The Planned Companies, Inc. (hereinafter referred to as "Defendants") are New Jersey corporations with their headquarters and principal place of business located in Parsippany, New Jersey.
4. Planned Security provides security services to companies throughout New Jersey and New York.

A. Plaintiff's Employment With Defendant Planned Security Services, Inc.

5. Plaintiff Philip Mordi ("Plaintiff") was employed by Planned Security from October 2004 through March 2007 as a security guard.

6. Plaintiff was assigned to numerous work sites during his tenure with Defendant Security Services, which included ADP in Bridgewater, New Jersey and Somerset Run in Somerset, New Jersey.

7. During his employment with Planned Security, Plaintiff only worked in New Jersey. Plaintiff was not assigned to any work sites in New York.

B. The Location and Expected Testimony of Potential Witnesses for Defendants

8. Planned Security's Regional Manager for Central New Jersey, Michael Grieco, lives in New Jersey and is employed at Defendants' headquarters in Parsippany, New Jersey. Mr. Grieco has information regarding the hours worked by Plaintiff, the overtime pay received by Plaintiff, and payment of overtime to other security guards employed by Defendants.

9. Plaintiff's direct supervisor while employed by Planned Security, Robert Vigliotti, lives in New Jersey and was employed at Defendants' Parsippany, New Jersey headquarters. Mr. Vigliotti has knowledge of the hours worked by Plaintiff, the overtime pay received by Plaintiff, and payment of overtime to other security guards employed by Defendants.

10. Planned Security's Human Resources Manager, Jill Lusto, has knowledge of the Company's overtime policies, rates paid to hourly employees, and general compensation policies. Ms. Lusto works out of Planned Security's Parsippany, New Jersey headquarters.

11. Defendants' Payroll Manager, Steve Cankay, has knowledge of how Plaintiff's overtime records reflect the payment of overtime. Mr. Cankay works out of Defendants' Parsippany, New Jersey headquarters.

C. The Location of Documents

12. To the best of my knowledge, all of Defendants' documents that would be relevant to Plaintiff's action are located in New Jersey. These documents include:

- a. Payroll Records
- b. Employee Earnings Records/Payment Stubs
- c. Time Records
- d. Personnel Records



Dino Iuliano